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April 26, 2017

The Honorable Jocelyn D. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, SC 29210

Re: Petition of United Telephone Company of the Carolinas, LLC d/b/a
CenturyLink, Frontier Communications of the Carolinas, Inc. and Dex
Media, Inc. for Full or Partial Waiver of Directory Publication
Requirements of S.C. Code Ann. Regs. 103-631
Docket No. 2016-390-C

Dear Ms. Boyd:

Attached for filing on behalf of the South Carolina Telephone Coalition
("SCTC") please find Comments of the SCTC in the above referenced docket.

Thank you for your assistance in this matter.

Very truly yours,

McNAIR LAW FIRM, P.A.



Margaret M. Fox

MMF:khh

Enclosures

cc: All counsel of record (w/*Enclosures*)

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BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2016-390-C

Petition of United Telephone Company of the Carolinas,)
LLC d/b/a CenturyLink, Frontier Communications of the)
Carolinas, Inc. and Dex Media, Inc. for Full or Partial)
Waiver of Directory Publication Requirements of)
S.C. Code Ann. Regs. 103-631)
_____)

COMMENTS OF THE SOUTH CAROLINA TELEPHONE COALITION

In its Notice of Workshop issued by the Public Service Commission of South Carolina (the “Commission”) dated February 28, 2017 in the above-captioned proceeding, the Commission directed interested persons to file comments regarding the means by which the segment of the population that does not have access to a computer, or ready access to a computer, or that want a paper directory, can best be served going forward as directories become more digitized. The South Carolina Telephone Coalition, on behalf of its individual member companies listed on Exhibit A (“SCTC”), respectfully submits these initial comments. SCTC appreciates the opportunity to participate in the Workshop scheduled by the Commission to address these issues. SCTC reserves the right to provide additional input at that time.

S.C. Code Ann. Regs. 103-631 requires telephone utilities to publish and distribute at regular intervals telephone directories that include listings for all of their customers. The Commission routinely waives this requirement for competitive local exchange carriers who inform the Commission that they will contract with the incumbent local exchange carrier serving the same area to provide the competitive carrier’s customers with directory listings and distribution. *See,*

e.g., Order No. 2016-792 in Docket No. 2016-321-C. While it makes sense to have one comprehensive directory that includes customer listings of all competing providers in a given area, it is unfair in a competitive environment to place the entire burden of publishing such a directory on the incumbent local exchange carrier. Furthermore, when SCTC member companies undertake to publish comprehensive directories, they often have difficulty obtaining timely and accurate listings from competing carriers.¹

Recently, in the above-captioned proceeding, the Commission granted a request by CenturyLink and Frontier for a conditional waiver of the directory distribution requirement. In doing so, the Commission recognized that the migration of consumers from landline to wireless service is having an impact on traditional printed directories, in that they typically do not include wireless telephone numbers and, therefore, are less complete today. The Commission also noted that consumers today are less likely to rely on print directories for basic number lookups and more likely to turn to digital alternatives, especially on their cellphones. Continued automatic delivery of printed directories, when a substantial number of customers no longer use them, is a waste of resources. While the Commission granted the conditional waiver, it expressed concern about those customers who do not have access to online resources. The Commission has requested input on how best to serve these customers.

SCTC respectfully submits that competing carriers should be treated in a similar manner. Companies should not be required to publish and distribute directories that are not being used, and one class of companies should not be required to bear the entire burden of publishing and distributing directories for all. The Commission's grant of a conditional waiver to CenturyLink

¹ Issues SCTC member companies have experienced include duplicate listings for the same customer, outdated listings for numbers no longer in service or numbers that have been reassigned to another customer, incomplete or inaccurate listings for businesses, misspelled names and addresses, and listings for numbers that should be unpublished.

and Frontier, which requires those companies to continue providing print directories upon customer request, eliminates some waste while protecting those customers who do not have access to online resources. However, as paper directory use continues to dwindle, the Commission should explore solutions that (1) protect consumers, (2) avoid waste, and (3) provide the same regulatory treatment to similarly-situated carriers. SCTC looks forward to participating in the Workshop to provide input and to explore available options to work toward achieving all of these goals.

Respectfully submitted,

By: 

M. John Bowen, Jr.

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ATTORNEYS FOR THE SOUTH CAROLINA
TELEPHONE COALITION

Columbia, South Carolina

April 26, 2017

EXHIBIT A

South Carolina Telephone Coalition Member Companies

Bluffton Telephone Company, Inc.
Chesnee Telephone Company
Chester Telephone Company, d/b/a TruVista
Comporium, Inc. (f/k/a Rock Hill Telephone Company)
Farmers Telephone Cooperative, Inc.
Ft. Mill Telephone Company, d/b/a Comporium
Hargray Telephone Company, Inc.
Home Telephone ILEC, LLC d/b/a Home Telecom
Horry Telephone Cooperative, Inc.
Lancaster Telephone Company, d/b/a Comporium
Lockhart Telephone Company, d/b/a TruVista
McClellanville Telephone Company (TDS)
Norway Telephone Company (TDS)
Palmetto Rural Telephone Cooperative, Inc.
Piedmont Rural Telephone Cooperative, Inc.
PBT Telecom, d/b/a Comporium
Ridgeway Telephone Company, d/b/a TruVista
Sandhill Telephone Cooperative, Inc.
St. Stephen Telephone Company (TDS)
West Carolina Rural Telephone Cooperative, Inc.
Williston Telephone Company (TDS)

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
Docket No. 2016-390-C

Petition of United Telephone Company of the)	
Carolinas, LLC d/b/a CenturyLink, Frontier)	
Communications of the Carolinas, Inc. and Dex)	CERTIFICATE OF
Media, Inc. for Full or Partial Waiver of Directory)	SERVICE
Publication Requirements of S.C. Code Ann.)	
Regs. 103-631)	
_____)	

I, Kathy H. Handrock, Paralegal for McNair Law Firm, P. A., do hereby certify that I have this date served one (1) copy of the Comments of the South Carolina Telephone Coalition regarding the above-referenced matter on the following parties of record by causing said copies to be deposited with the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown below.

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